

REMARKS

Claims 1-20 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 8 and 19 stand rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential elements, such omission amounting to a gap between the elements. Claims 8 and 19 have been amended to include any omitted essential elements. No new matter has been added. Withdrawal of the rejection of claims 8 and 19 under 35 U.S.C. § 112, second paragraph, is respectfully requested.

Claims 1-7, 9-18 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van De Veen (U.S. Patent No. 5,943,643) (hereinafter "Van De Veen") in view of Dale and Reiter (EACL-99) (hereinafter "Dale") and in further view of Chen et al. (U.S. Patent No. 5,806,021) (hereinafter "Chen"). The rejection is respectfully traversed.

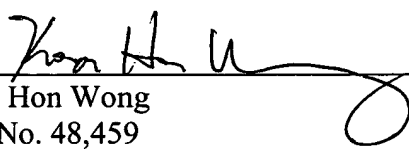
The Office Action relies on Dale as teaching "receiving *a scoring function* from the user" as claimed in claim 1. In particular, the Office Action relies on page 33, slide 98 of Dale, which teaches deriving schemas from a corpus. However, the derivation of schemas from a corpus does not teach or suggest "receiving *a scoring function* from the user," much less "determining an optimal natural language phrase from the possible natural language phrases *using the scoring function*," also claimed in claim 1. Thus, the combination of Van De Veen, Dale and Chen do not teach or suggest "receiving *a scoring function* from the user" as claimed in claim 1. The arguments provided for claim 1 apply, at least in part, to independent claim 12. Withdrawal of the rejections to claims 1 and 12 is respectfully requested.

It is further respectfully submitted that the piecemeal combination of isolated portions of disparate references provided by the Examiner implies an improper exercise of hindsight reconstruction using the Applicant's own disclosure. It was impermissible for the examiner to use the claimed invention as an instruction manual or "template" in attempting to piece together isolated disclosures and teachings of the prior art so that the claimed invention was rendered obvious. For example, the Office Action relies on the derivation of schemas from a corpus, as taught by Dale, as teaching a "scoring function" in claim 1, but relies on a disparate teaching of Chen as teaching "using the scoring function," although Chen discloses nothing even remotely related to the schemas of Dale. Other weaknesses can be found throughout the claim rejections as the cited portions of the references are entirely unrelated to each other.

Accordingly, independent claims 1 and 12 are believed to be patentably distinguishable over the combination of Van De Veen, Dale and Chen. Claims 8 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Van De Veen, Dale and Chen, and further in view of Asahara et al. (17th conference on computational linguistics). Dependent claims 2-11 and 13-20 are believed to be allowable for at least the reasons given for the independent claims. Withdrawal of the rejection of claims 1-20 under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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